

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kenneth C. Weaverling, Jr. and : No. 17-15925-ELF
Virginia Stanley :
Debtors :
: Chapter 13

**OBJECTION TO PROOFS OF CLAIM NOS. 19 AND 20 OF
FULTON BANK, NA**

Debtors, Kenneth C. Weaverling, Jr. and Virginia Stanley, by their attorney, Stanley E. Luongo, Jr., Esquire pursuant to 11 U.S.C. § 502, F.R.B.P. 3002 and F.R.B.P. 3007(d)(4) hereby objects to the Proofs of Claim numbers 19 and 20 of Fulton Bank, NA and states the following reasons in support thereof:

1. On or about August 31, 2017 the debtors filed the instant Chapter 13 Bankruptcy.
2. The Debtors' Meeting of Creditors occurred on October 18, 2017.
3. Pursuant to Federal Rule of Bankruptcy Procedure 3002 all non governmental creditors were required to file proofs of claim no later than January 16, 2018. A true and correct copy of the Court's Notice specifying the deadline is attached as Exhibit "A".
4. On January 17, 2018 Fulton Bank, NA filed Proof of Claim No. 19 in the amount of \$80,844.75. A copy of the Proof of Claim is attached as Exhibit "B".
5. The aforesaid Proof of Claim is untimely.
6. Fulton Bank, NA has no valid excuse on why it filed an untimely Proof of Claim. Accordingly, Fulton Bank, NA's Proof of Claim must be disallowed.
8. On January 17, 2018 Fulton Bank, NA filed Proof of Claim No. 20 in the amount of \$32,495.91. A copy of the Proof of Claim is attached as Exhibit "C".

9. The aforesaid Proof of Claim is untimely.
10. Fulton Bank, NA has no valid excuse on why it filed an untimely Proof of Claim.

Accordingly, Fulton Bank, NA's Proof of Claim must be disallowed.

WHEREFORE, Debtors request the Court to disallow the Proofs of Claim of Fulton Bank, NA and enter the attached Order.

Respectfully Submitted,

LUONGO BELLWOAR LLP

By: /s/ Stanley E. Luongo, Jr.
Stanley E. Luongo, Jr., Esquire
Attorney for Debtors
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Date: March 16, 2018

